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October 12, 2020

VIA ECF

Hon J. Paul Oetken
Thurgood Marshall United States Courthouse
40 Foley Square
Room 2101
New York, NY 10007

**Re: In re Application of Karam Salah Al Din Awni Al Sadeq for an Order Under
28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings,
Case No. 1:20-mc-00275-JPO**

Dear Judge Oetken:

We are counsel to the Applicant Karam Salah Al Din Awni Al Sadeq (“Applicant” or “Mr. Al Sadeq”). Pursuant to Your Honor’s Individual Rules of Practice in Civil Cases, we write to seek an extension of time to file to opposition papers with respect to the motion of Dechert LLP (“Dechert”) to quash the subpoena issued to it by Mr. Al Sadeq.

On October 6, 2020, Dechert filed its motion to quash the subpoena issued to it by Mr. Al Sadeq. Given the complexity of the matter and the numerous issues raised by the motion, including the applicability of English law, the parties have conferred and agreed that a brief extension of the deadline to oppose Dechert’s motion as mandated by the Southern District’s Local Rules is necessary.

The parties have conferred and propose the following briefing schedule:

- a) Mr. Al Sadeq’s opposition, which is due October 13, 2020, shall be filed on or before October 27, 2020; and
- b) Dechert’s reply, which is due October 15, 2020, shall be filed on or before November 17, 2020.

ROSENFELD & KAPLAN, LLP
TO: HON. J. PAUL OETKEN
DATE: OCTOBER 12, 2020
PAGE: - 2 -

This is Mr. Al Sadeq's first request for an extension of time to file opposition papers with respect to Dechert's motion to quash.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Tab K. Rosenfeld".

Tab K. Rosenfeld

TKR/cp

cc: Counsel of Record (via ECF)